

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES, INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DEFENDANTS' MOTION TO SEAL EXHIBIT A TO SUPPORTING
DECLARATION TO RESPONSE IN OPPOSITION TO
PLAINTIFF'S MOTION TO COMPEL DISCOVERY**

Pursuant to Local Rule 79.1, and paragraph 2(f) of the Stipulated Protected Order (ECF No. 55) (the "Protective Order"), Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Castle Hill"), hereby request that the Court enter an order sealing Exhibit A to the Declaration of Robert C. Gill in Support of Defendants' Opposition to Plaintiff's Motion to Compel Discovery (ECF No. 110). In support of this request to seal, Defendants state as follows:

1. Exhibit A to the Declaration of Robert C. Gill consists of email correspondence between counsel for Castle Hill and counsel for Plaintiff dated between July 8, 2018 and July 30, 2018. The correspondence contains sensitive and proprietary trade secret information. Pursuant to paragraph 2(c) of the Protective Order, such information is to be treated as Highly Confidential Information.

2. Pursuant to Local Rule 79.1, General Order 08-11, and the Protective Order, Castle Hill filed both a public, unredacted Opposition with a public, redacted Exhibit A to the Declaration of Robert C. Gill in Support of Defendants' Opposition to Plaintiff's Motion to

Compel Discovery (ECF No. 109), and a sealed, unredacted Opposition, and a sealed, unredacted Exhibit A to the Declaration of Robert C. Gill (ECF No. 110).

WHEREFORE, Defendants respectfully request that the Court enter an Order granting this Motion to Seal and sealing Exhibit A to the Declaration of Robert C. Gill in Support of Defendants' Opposition to Plaintiff's Motion to Compel Discovery (ECF No. 110).

Dated: August 1, 2018

Respectfully submitted,

/s/ Robert C. Gill

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of August, 2018, I caused a copy of the foregoing **DEFENDANTS' MOTION TO SEAL RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL DISCOVERY AND SUPPORTING DECLARATION** to be filed using the Court's ECF system, which will provide electronic notification of filing to the following counsel for Plaintiff:

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